

SUPPORTING STATEMENT

Application for Posthumous Citizenship

(Form N-644)

OMB No. 1615-0059

A. Justification.

1. This collection is necessitated by the enactment of the Posthumous Citizenship for Active Duty Service Act of 1990, Pub. L. 101-249, dated March 6, 1990, which added section 329A of the Immigration and Nationality Act (Act). The Act provides an avenue for an alien or non-citizen national who served in an active duty status with the United States Armed Forces, during specified periods of military hostilities, and who dies as a result of injury or disease incurred in or aggravated by that service, to be declared a citizen of the United States at the time of death. This is an honorary citizenship status and conveys no benefits under the Act to any surviving relative of the decedent.

2. The information furnished on this form is used by the Immigration and Naturalization Service (INS) Service Center directors to determine the eligibility of a person who applies for posthumous citizenship on behalf of a deceased alien or non-citizen national service member and to determine the decedent's eligibility for a grant of posthumous citizenship.

These determinations will be made through examination of the application and, where required, the evaluation of supporting documents. If the information is not collected and

presented to INS, no mechanism will exist from which to conduct an adjudication for the posthumous awarding of United States citizenship.

3. The use of this form currently provides the most efficient means for collecting and processing the required data. In this case the Service does not employ the use of information technology in collecting and processing information. Currently, the INS does not have the automated capability in place to accept electronic submission of this application.
4. A review of the Immigration and Naturalization Service Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available that can be used for this purpose.
5. This collection of information does not have an impact on small businesses or other small entities.
6. If this information is not collected the INS would be impeded from its ability to verify eligibility and adjudicate the request for awarding posthumous citizenship.
7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

8. The INS published a notice in the Federal Register on September 4, 2002 at 67 FR 56592. The notice allowed for a 60-day public review and comment period. No comments were received by the INS.
9. The Service does not provide payment or gifts to respondents in exchange for a benefit sought.
10. There is no assurance of confidentiality.
11. There are no questions of a sensitive nature.
12. Annual Reporting Burden:
 - a. Number of Respondents 50
 - b. Number of Responses per each request 1
 - c. Total Annual Responses 50
 - d. Hours per Response 1.83
 - e. Total Annual Reporting Burden 92
 - f. Total Public Cost \$ 4,920

Annual Reporting Burden

Total annual reporting burden is 92. This figure was derived by multiplying the number of respondents (50) x frequency of response (1) x 1 hour and 50 minutes (1.83 hours) per

response. The projected hours per response for this collection of information were derived by first breaking the process of filing into three basic components:

Learning about the Law and the Form	60 Minutes
Completing the Form	30 Minutes
Assembling and Filing the Form	20 Minutes
<i>TOTAL Hours per Response</i>	110 Minutes (1.83)

For the first two components, an estimated response time was listed based upon INS experience with prior citizenship applications. The third component of the process, Assembling and Filing the Form, was based upon the mailing of the application to the Service Center having jurisdiction over the applicants residence, or from outside of the United States.

Annual Public Cost

The estimated annual public cost is \$ 4,920. This estimation is based on the number of respondents (50) x 1 hour and 50 minutes (1.83) hours per response x \$10 (average hourly rate) plus the number of respondents (50) x \$80 fee charge.

13. There are no capital or start-up costs associated with this information collection. Any cost burdens to respondents as a result of this collection are identified in item 14. (*There is a \$80 fee charge of associated with the filing of this information collection.*)

14. Annualized Cost Analysis:

Printing Cost	\$ 20
Collecting and Processing	\$ 3,980
Total Cost to Program	\$ 4,000
Fee Charge	\$ 4,000
Total Annual Cost to Government	\$ 0

Government Cost

The estimated cost of the program to the Government is calculated by using the estimated number of respondents (50) multiplied (x) by the \$80 fee charge (which includes the suggested average hourly rate for clerical, officer, and managerial time with benefits). In addition, this figure includes the estimated overhead cost \$20 for printing, stocking, distributing and processing of this form.

15. There has been no increase or decrease in the estimated number of annual burden hours for this information collection.
16. The Service does not intend to employ the use of statistics or the publication thereof for this collection of information.

17. The Service is not seeking approval to not display the expiration date for OMB approval of this information collection.
18. The Service does not request an exception to the certification of this information collection.
See attached Item 19 of Form OMB 83-I.

B. Collection of Information Employing Statistical Methods.

Not Applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Richard A. Sloan

Director,

Regulations and Forms Services Division

Date